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**Federal Communications Commission**

The FCC Acknowledges Receipt of Comments From ...  
**Office of Consumer Advocate**  
...and Thank You for Your Comments

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Your Confirmation Number is: '2000613249737 ' 1

Date Received: Jun 13 2000

Docket: 94-129

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## OFFICE OF CONSUMER ADVOCATE

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IRWIN A. POPOWSKY  
Consumer Advocate

FAX (717) 783-7152  
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June 13, 2000

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Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S. W.  
Washington, DC 20554

In The Matter Of Implementation of the  
Subscriber Carrier Selection Changes  
Provisions of the Telecommunications Act of  
1996; Policies and Rules Concerning  
Unauthorized Changes of Consumers Long  
Distance Carriers  
CC Docket No. 94-129; DA 00-1093

Dear Ms. Salas:

Enclosed please find an original and four copies of Comments of the Pennsylvania Office of Consumer Advocate Regarding Requiring Resellers to Obtain Carrier Identification Codes in the above-referenced matter. Please also note that these Comments have been filed with the Commission electronically.

Please indicate your receipt of this filing on the additional copy provided and return it to the undersigned in the enclosed self-addressed, postage prepaid, envelope. Thank you.

Sincerely yours,

Philip F. McClelland

Senior Assistant Consumer Advocate

Enclosure

cc: Al McCloud, Network Services Division

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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

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JUN 14 2000

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IN THE MATTER OF IMPLEMENTATION  
OF THE SUBSCRIBER CARRIER  
SELECTION CHANGES PROVISIONS OF  
THE TELECOMMUNICATIONS ACT OF  
1996

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CC Docket No. 94-129  
DA 00-1093

POLICIES AND RULES CONCERNING  
UNAUTHORIZED CHANGES OF  
CONSUMERS LONG DISTANCE  
CARRIERS

**COMMENTS OF THE PENNSYLVANIA  
OFFICE OF CONSUMER ADVOCATE  
REGARDING REQUIRING RESELLERS TO OBTAIN  
CARRIER IDENTIFICATION CODES**

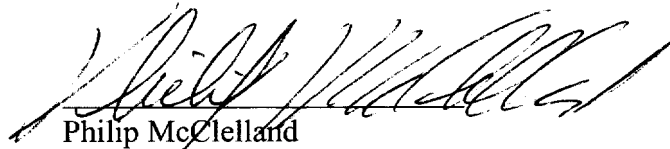
The Pennsylvania Office of Consumer Advocate (PaOCA) submits the following comments in response to the Federal Communications Commission's (FCC's) Solicitation of Supplemental Comments as published on May 23, 2000. Fed. Reg., Vol. 65, No. 100, p. 33281. In this Solicitation, the FCC requests further information concerning what steps would be necessary for all resellers to be given their own Carrier Identification Codes (CICs) separate from the CIC of the facilities based carrier. The FCC also requests further information concerning the extent to which slamming takes place from the facilities based carrier to a reseller - both of which share the same CIC, i.e. "soft slamming." Id. at 33282.

The PaOCA has no comment on the technical issues concerning acquiring separate CICs by resellers or data as to what portion of all slamming involves "soft slamming." Nonetheless, the PaOCA supports the FCC's effort to require resellers to have unique CIC identifications. The PaOCA has

discovered this problem on many occasions as we have tried to resolve slamming complaints. We have often found - given that the reseller is using the same CIC as the carrier they purchase wholesale service from - that it is difficult to determine who the customer is being served by from the local carriers records. This makes the confusion related to a slamming allegation even more difficult to resolve.

Accordingly, the PaOCA encourages the FCC to resolve the issues raised in the Solicitation as rapidly as possible so that resellers can operate with their own unique CICs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Philip McClelland", written over a horizontal line.

Philip McClelland  
Senior Assistant Consumer Advocate

Counsel for:  
Irwin A. Popowsky  
Consumer Advocate

Office of Consumer Advocate  
555 Walnut Street 5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
(717) 783-5048

Dated: June 13, 2000

00058601.WPD

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION

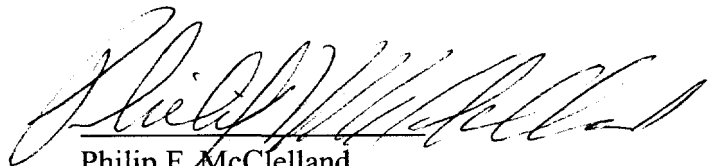
IN THE MATTER OF IMPLEMENTATION :  
OF THE SUBSCRIBER CARRIER :  
SELECTION CHANGES PROVISIONS OF :  
THE TELECOMMUNICATIONS ACT OF :  
1996 :  
POLICIES AND RULES CONCERNING :  
UNAUTHORIZED CHANGES OF :  
CONSUMERS LONG DISTANCE :  
CARRIERS :

CC Docket No. 94-129  
DA 00-1093

I hereby certify that I have this day served a true copy of the foregoing document,  
Comments, upon parties of record in this proceeding.

Dated this 13th day of June, 2000.

Respectfully submitted,



Philip F. McClelland  
Senior Assistant Consumer Advocate

Counsel for  
Office of Consumer Advocate  
555 Walnut Street, Forum Place, 5th Floor

Harrisburg, PA 17101-1923  
(717) 783-5048

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*One diskette.*